SOUTHERN DISTRICT OF NEW YORK	37	
SERGEY LEONTIEV,	X	
Plaintiff,	1	Case No. 1:16-cv-03595 (JSR)
- V	9	
ALEXANDER VARSHAVSKY,	:	
Defendant.	:	
	X	

## SUPPLEMENTAL DECLARATION OF SEAN HECKER IN OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I, SEAN HECKER, declare under penalty of perjury as follows:

- 1. I am a partner at the law firm of Debevoise & Plimpton LLP and am counsel of record for Defendant Alexander Varshavsky.
- 2. I respectfully submit this Supplemental Declaration in further support of Defendant's opposition to Plaintiff's Motion for Summary Judgment, and as permitted by the Court in a telephonic Order on February 13, 2017.
- 3. Attached hereto are supplements to Exhibits 12 to 15, 18, 21, 26, 38, and 59 of the Declaration of Sean Hecker dated February 10, 2017 (ECF 60). These supplements include transcript pages cited in Defendant's Response to Plaintiff's Local Rule 56.1 Statement (ECF 57) but inadvertently omitted from the collection of transcript excerpts attached to the Declaration of Sean Hecker dated February 10, 2017.
- 4. Attached hereto as Exhibit 12 (Supplement) is a true and correct copy of excerpts of the transcript of the December 16, 2016 deposition of Andrei Pavlovich.

- 5. Attached hereto as Exhibit 13 (Supplement) is a true and correct copy of excerpts of the transcript of the January 5, 2017 deposition of Alexander Varshavsky.
- 6. Attached hereto as Exhibit 14 (Supplement) is a true and correct copy of excerpts of the transcript of the January 3, 2017 deposition of Sergey Leontiev.
- 7. Attached hereto as Exhibit 15 (Supplement) is a true and correct copy of excerpts of the transcript of the December 16, 2016 deposition of Alexander Zheleznyak.
- 8. Attached hereto as Exhibit 18 (Supplement) is a true and correct copy of excerpts of the transcript of the December 20, 2016 deposition of Kamo Avagumyan.
- 9. Attached hereto as Exhibit 21 (Supplement) is a true and correct copy of excerpts of the transcript of the January 17, 2017 deposition of Irina Monakhova.
- 10. Attached hereto as Exhibit 26 (Supplement) is a true and correct copy of excerpts of the transcript of the January 9, 2017 transcript of Vitaliy Popov.
- 11. Attached hereto as Exhibit 38 (Supplement) is a true and correct copy of excerpts of the transcript of the January 11, 2017 deposition of Alexander Shcheglyaev.
- 12. Attached hereto as Exhibit 59 (Supplement) is a true and correct copy of excerpts of the transcript of the January 6, 2017 deposition of Vadim Voronin.

I swear under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2017.

Sean Hecker

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